

Independent Age submission to Work and Pensions Committee inquiry: Safeguarding vulnerable claimants

October 2023

1. About Independent Age

Independent Age is a national older people's charity that supports people facing financial hardship in later life. We offer free and impartial advice and information and give grants to community organisations. In addition, we use the knowledge and understanding gained from our frontline services to highlight the issues experienced by older people facing financial hardship.

For more information about Independent Age please visit www.independentage.org.
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2. Summary

- There are a number of factors – including health conditions, caring responsibilities and life events like bereavement – that can lead to older people being considered 'vulnerable' in the context of making a claim for benefits.
- Older people can face a number of challenges when trying to make a benefits claim or query through Department for Work and Pensions (DWP) channels. These challenges can be particularly difficult and distressing for older people considered to be vulnerable claimants, and can lead to people missing out on vital support. Poor systems present a risk that people most in need give up and miss out on the support they are entitled to.
- The criteria DWP uses to decide if someone is vulnerable can be unclear, and initiatives aimed at providing extra support for people considered vulnerable claimants are not always made available for people our advisers would consider to be vulnerable and in urgent financial need.
- Particular barriers vulnerable claimants face when trying to contact DWP via telephone include long waiting times on hold, being redirected to alternative teams who are not able to help them with their query, not hearing back when promised, and having to call back multiple times to progress their case.
- Independent Age recommends that DWP:
 - make clearer its eligibility criteria for extra support based on vulnerability;
 - make improvements to their telephone service to improve claimants' experiences;
 - learn from initiatives that have worked well for Universal Credit to help older claimants.

3. Introduction

It is important to say that many older people do not associate with the word 'vulnerable' and find it incredibly disempowering, so at Independent Age (IA) we speak about the life circumstances and situations that can make people vulnerable. We use 'vulnerable' claimant in this submission to reflect the language used by the committee.

This submission answers questions 3 and 3b in the call for evidence for the Work and Pensions Committee inquiry into safeguarding vulnerable claimants.¹ We provide evidence from our welfare benefits advice team, which supported 878 cases relating to welfare benefits for older people in the period 1/10/22 to 30/09/23. When necessary, our advisers take on a case worker role which may include contacting DWP on behalf of a person, or arranging a three-way call between themselves, the person and a DWP call handler to facilitate a conversation. As a result of their work with older people, our

advisers have deep experience and insight into these issues. Our advice service has been taking part in the DWP vulnerability referral scheme (live at the time of writing).

IA advisers speak daily to older people who are financially insecure. Many of them have additional challenges which could be considered in terms of vulnerability, whether due to physical or mental health problems, declining cognitive abilities, caring responsibilities, social or digital isolation, bereavement or other significant life events. In some cases multiple vulnerabilities compound the difficulties people face when trying to apply for, or address issues with, welfare benefits.

Our advisers identified a number of particular issues and pinch points that have made things difficult for people who could be considered vulnerable. We discuss these below and share some suggestions for what DWP could do to make things easier for older people to access the welfare benefits they are entitled to. We hope these will be useful for the committee as it develops its recommendations.

4. Q3. What are the main challenges that vulnerable claimants face when trying to make a new benefit claim?

4.1 Defining vulnerability

We are aware that DWP does not adhere to a specific definition of vulnerability, or at least does not make one public. With this in mind, we want to share a brief definition of vulnerability we use. We recognise there is a wider debate about defining vulnerability but for the purposes of this submission and the issues at hand, based on our experience delivering advice services we use 'vulnerable' to describe someone experiencing any of the following factors:

- Long term physical or mental health conditions and/or disabilities, or cognitive health conditions.
 - In 2021, 35% of people aged 75–79 in England had a disability, rising to 64% of those aged 90+.²
- Having caring responsibilities.
 - In 2021, there were almost 1.2 million unpaid carers aged 65+ over in England and Wales, just over 1 in 10 of the older population.³
- Social isolation.
 - 1.4 million older people in the UK self-report as often lonely.⁴
- Lack of internet access.
 - In 2022, some 25% of people aged 65+ did not have internet access at home.⁵

In addition, there are shorter term factors or events that may contribute to vulnerability including:

- An acute or short-lived physical or mental health condition.
 - People aged 65+ represent 21% of total A&E attendances and half (49%) of attendances that arrive by ambulance, indicating a higher level of complexity and acuity.⁶
- Experiencing a bereavement.
 - People aged 65+ are the age group most likely to experience bereavement, and most at risk of severe mental health consequences that often accompany grief such as prolonged grief disorder.⁷

Our advisers often speak to people experiencing more than one of these issues.

While being of an older age does not on its own make a person vulnerable, we note that the likelihood of experiencing the above factors increases with age. For example, the proportion of adults with a limiting longstanding illness increases from 31% of those aged 65-69 to 57% of those aged 80+.⁸

4.2 General difficulties with DWP claims processes

Moving on to the challenges vulnerable people experience, the older people supported by IA advisers face a number of common barriers to making a claim, reporting a change of circumstances or querying a decision. These include:

- being unable to access online application processes,
- complicated or long claim processes, and
- delays when trying to make applications or queries by telephone.

We previously shared evidence with the committee about the difficulties older people can have when applying for Attendance Allowance (AA), for example.⁹ This highlighted some of the difficulties people experience when completing the AA application form, and the importance for some people of face-to-face support in making a claim.

While these experiences can be frustrating for anyone in need of financial support, for some older people these situations can risk excluding them from being able to claim the support they are entitled to. This can cause distress and leave people in severe hardship.

4.3 Specific support for vulnerable claimants

We are aware of specific initiatives DWP has in place aimed at supporting vulnerable people to make a claim for benefits, and welcome the intention behind these. However, in the experience of our advisers such support is not always easily accessible to the people IA supports, and eligibility criteria can be unclear, as Case 1 below demonstrates.

Since May 2023, DWP has provided IA advisers with contact details for a vulnerability inbox. The intention was that, when advisers identified a caller who was vulnerable and in financial hardship they could forward details of the case to the DWP's vulnerability email inbox for the case to be escalated. DWP did not provide criteria for vulnerability.

While IA advisers speak to many people they consider vulnerable, they have to date only forwarded a handful of cases to the DWP vulnerability inbox, selecting only those facing the most severe vulnerability and in financial hardship. As of early October 2023, all referred cases have been deemed ineligible for the vulnerability inbox, with DWP disagreeing that the person in question is vulnerable and/ or in financial hardship. It is unclear which criteria DWP are using to determine this. However, on a number of occasions DWP has told IA advisers in meetings that a person would not be considered vulnerable due to "urgent financial need" if they are in receipt of any amount of State Pension. Given that the vast majority of pensioners receive some State Pension, this means only a tiny minority of people past State Pension age could be seen as financially vulnerable.

We disagree with this assessment – around 840,000 older people are in receipt of less than £80 per week in State Pension payments.¹⁰ If they are also missing out on Pension Credit, Attendance Allowance, or other benefits – bearing in mind that up to 850,000 people could be missing out on Pension Credit and up to 220,000 pensioners missing out on Housing Benefit¹¹ – and have little or no other source of income, this could mean they are facing severe financial hardship. In the case of someone in this situation with vulnerabilities, we would consider this to be a case of urgent financial need and expect the system to account for this.

While some cases were escalated from the DWP vulnerability inbox to other DWP teams that were able to help resolve the issues raised, it would still be helpful for consistency

and efficiency for IA advisers to have greater clarity on who would qualify for support through this channel.

Case 1: Mr and Mrs A

Mr Aⁱ is 70 and receives the State Pension and Personal Independence Payment (PIP). He has been caring for his wife Mrs A for some years but never claimed Carer's Allowance. Mrs A turned State Pension age earlier this year. She also receives the State Pension and PIP. Prior to reaching 66 she received Employment and Support Allowance, and Carer's Allowance as she cared for Mr A.

When Mrs A reached State Pension age the couple's income reduced significantly, and they were confused as to what had happened with their benefits. They also experienced a language barrier.

An IA adviser completed a benefit check, which showed if they both had an underlying entitlement to Carer's Allowance (UE to CA), they could get Pension Credit worth £17.50 per week and Council Tax Reduction of £29.15 per week (along with other support that Pension Credit passports recipients to).

Mr A called DWP to ask if they currently had an UE to CA or not but was told 'you can only get an UE to CA if you are getting Pension Credit', which is incorrect information. The IA adviser then called DWP with Mr & Mrs A. It was established that Mr A did not have an UE to CA on his record despite potentially being eligible, so he applied for it. DWP was unsure if Mrs A had an UE to CA and said someone would get back to the adviser soon.

The adviser did not hear anything from DWP for nine days. They then used the vulnerable customer inbox system, as this delay of information was causing a delay in the couple being able to receive Pension Credit. The adviser received a response saying the couple were not in financial hardship so the referral was inappropriate.

However, DWP did confirm that Mrs A had an UE to CA and could make an application. This was a good outcome but following a poor process.

Another form of support IA advisers are aware of is the option of DWP home visits to help an older person complete an application for a benefit. While this is a valuable service for vulnerable claimants we are aware of issues, as demonstrated by Case 2.

Case 2: Ms B

Ms B was in touch with an IA adviser. She has long-term health conditions and lives alone with little social contact.

The DWP home visiting service visited her to help her make a claim for Attendance Allowance (AA). Ms B said the visiting officer asked questions and took forms away, so she was under the impression that they had made a claim for AA on her behalf.

When the IA adviser spoke to Ms B, she was confused as she had not heard anything following the visit. The adviser supported her to speak to the AA team at DWP, who said they could see she had been visited and that a report had been made. The IA adviser assumed this to mean DWP was processing her claim.

When the IA adviser rang Ms B a few weeks later, she had still not heard anything. The adviser supported her again to speak to the AA team. This time the adviser and

ⁱ We have not used the real initials of the people discussed in these case examples.

Ms B were told that the visiting officer had decided she was not entitled to AA and therefore did not submit any claim forms and had not completed them in the first place. Ms B had been unaware of this.

The IA adviser asked if Ms B was due to get a letter confirming the decision and was told no, as there was no decision to make as a claim was never made. This was a confusing and distressing outcome for Ms B.

This is a concerning case due to the lack of communication with the claimantⁱⁱ about the outcome of the visit, particularly as it meant that Ms B was not given the opportunity to challenge or query the decision not to submit an application for AA on her behalf.

In the case of home visits, there needs to be clear and prompt communication with the claimant about whether a decision has been made to submit a claim, and the rationale behind the decision if an application has not been made.

4.4 Accessibility of DWP telephone lines

Cases from IA's advice team suggest that the DWP public telephone lines for claimants are not easily accessible to people with certain health conditions, disabilities or caring responsibilities.

In the experience of our advisers, it is not unusual for an older person to have to wait on hold for an hour or longer, four or five times before they finally reach the person they need to speak to. This can happen with telephone lines for various benefits, including Pension Credit, Disability Living Allowance and PIP. Physical and mental health conditions make it impossible for some people to wait on hold for long. This can be because of fatigue, anxiety, or a physical condition or disability that means they can't stay in the same position for long periods of time, such as holding a telephone.

Similarly, it can be very difficult for carers to plan calls at specific times, given how reactive they have to be to the needs of the person they care for. IA advisers have been on calls to DWP with carers, waiting on hold but then having to end the call as the carer has to address the needs of the person they care for. The IA adviser cannot continue the call without them due to data protection rules. While we understand the importance of data protection, any reforms that would allow advisers in similar circumstances to speak to DWP without the person constantly present or without the person having to be on hold would represent progress.

DWP lacks a specific telephone line for 'vulnerable' claimants, meaning all claimants have to contact the telephone line for the specific benefit and aren't always able to access support tailored to their needs through these channels.

Our advisers also highlighted an issue they sometimes encounter where claimants are re-routed to an alternative team when call volumes are high. This means they wait on hold to speak to a secondary team that may or may not be able to help them, and then potentially have to call back the original team and wait again. Case 3, below, is just one example of this experience. Similarly, DWP call handlers have told our advisers – who have followed the published telephone number for the appropriate department but somehow reached the wrong department – they cannot directly transfer them to the correct department.

It is not uncommon people to have to follow up multiple times to progress their claim. In some cases the caller may wait too long on hold and have to leave to do something else, or DWP will say they will call back in 10 days or send a letter but fail to do so, so the

ⁱⁱ We use the term 'claimant' throughout to cover everyone engaging with the system, whether claiming or inquiring.

caller has to follow up again. As callers aren't provided with a direct number to call back the person they spoke to they have to start the process again each time.

Older people can get discouraged by this circular process of calling and waiting. For those with certain health conditions the time spent on hold can be actively discomforting or distressing, leaving them with no option but to give up. IA advisers sometimes have to encourage people to call DWP again to progress things as they have become demoralised, despite the financial difficulty they are in.

Case 3: Mr C

Mr C lives alone and has a number of long-term health conditions.

An IA adviser supported him to make a three-way call to the Pension Service, but the call was rerouted and redirected four times. This meant he was unable to get through to the Pension Credit change of circumstances team as intended.

The IA adviser encouraged Mr C to try to call the Pension Credit team again as soon as possible, or try to register a change of circumstances by writing to them at the address on his latest Pension Credit decision notice.

Shortly after, the IA adviser made a follow-up call to Mr C who said he had tried to contact the Pension Credit team again but once again had been cut off.

He declined the adviser's offer to support him to make another call to the Pension Credit team.

5. Q3b What should DWP do to improve support for vulnerable people to make a claim and to ensure they do not delay making a claim?

Recommendation 1: DWP should make explicit a nuanced definition of vulnerability in the context of claiming benefits

We recommend that DWP make clearer its definition of vulnerability. Individuals and the organisations who support them need to know who is eligible for additional support – such as via the vulnerability inbox – when making a claim for, or enquiry about, benefits. While we do not recommend an exhaustive list of factors that may make a person vulnerable, the factors listed in section 4.1 above are issues our advisers commonly see that hinder many older people's ability to deal with the benefits system.

Based on IA's evidence, DWP should acknowledge that receiving a small amount of State Pension does not necessarily preclude a claimant from being in financial need/hardship.

We would also highlight learning from the Care Act 2014 about how DWP might go about prioritising those most in need of additional support, particularly those who have care and support needs or who are a carer themselves. The Care and Support Statutory Guidance (Chapter 14) recognises the potential vulnerability of informal carers. The impact of caring on a person's general health and wellbeing and their finances is well documented,¹² highlighting the daily stresses and strains that carers experience. For these reasons, it seems reasonable to expect the DWP to consider caring responsibilities a potential cause for vulnerability, and that if a carer is experiencing a particularly acute period of stress, such as a deterioration in the health of the person they care for, it is extremely challenging for them to deal with a benefits issue which includes spending a long time on the telephone (for example). Problems in reaching the right department, etc., can exacerbate stress and potentially impact on people's ability to provide care.

While the term vulnerability is not used in the Care Act parallels could be drawn with the Act's definition of adults who may be supported through a safeguarding enquiry were they to experience or be at risk of abuse and neglect. These are adults who have needs for care and support, whether or not they are receiving services for these needs. Having care needs may make it harder for people to navigate systems for benefit claims, with issues such as fatigue, pain, mobility issues, cognitive problems or incontinence limiting how long they can sit/stand or be on the telephone. The stress of navigating the system may impact their health condition. Furthermore, in relation to both carers and adults who may have care needs, the implications of missing out on or losing benefits can present serious risks to their health and wellbeing.

Recommendation 2: DWP should improve the benefits telephone lines user experience

IA advisers often support older people frustrated and demoralised by the experience of trying to phone teams at DWP to make a claim for benefits, report a change of circumstances or query a decision. This can be particularly difficult for people who are made vulnerable by a health condition or other circumstances.

From IA's experience supporting older people, we feel that DWP's threshold of vulnerability is too high and that what claimants end up going through, such as long waiting times, is problematic for many of the people we interact with.

Limiting the number of people a vulnerable caller has to speak to would make the process more accessible. We recommend DWP consider implementing a dedicated telephone line which vulnerable callers could be referred to, where they could be provided with additional help and sensitivity to their situation.

Longer-term, the Government should look at the 'Make the Call' benefits service in Northern Ireland, evaluating whether its use of a single contact number for all benefits would provide a better experience for people throughout the UK.¹³

One of the reasons older people have to make repeated calls to DWP is that they are told they will hear back within a set time period, often 10 days, but then receive no communication in this timeframe. We therefore recommend that DWP is held to account on response times to callers and ensures they are giving an accurate and realistic timeframe, even if only to reassure the claimant that their claim is ongoing.

A further issue that needs to be addressed is the experience of being re-routed to a different team than intended and having to go through the hold process again. We recommend that DWP consider alternative measures to deal with high call volumes, such as giving callers the option to arrange for a call back at an alternative time.

Recommendation 3: DWP should analyse good practice around supporting Universal Credit claimants and extend this to pensioners

IA advisers highlighted some areas of good practice around Universal Credit claimants that they felt could be helpful if also made available to pensioner claimants. This included an adviser-only line that allowed advice services (like IA) to follow up and escalate specific cases without having to go through the public telephone lines, as part of the Help to Claim service.

We therefore recommend DWP consider implementing adviser-only phone lines in relation to pensioner age benefits.

¹ [Safeguarding vulnerable claimants - Committees - UK Parliament](#)

² Create a custom dataset, Office for National Statistics, 28 March 2023, see ons.gov.uk/datasets/create. Data extracted on 7 April 2023. Population type was households, and variables were household composition and life stage of household reference person.

³

<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/ageing/articles/profileoftheolderpopulationlivinginenglandandwalesin2021andchangessince2011/2023-04-03#:~:text=10.-,Carers,ages%2075%20to%2079%20years>

⁴ <https://www.ageuk.org.uk/our-impact/policy-research/loneliness-research-and-resources/#:~:text=1.4%20million%20older%20people%20in,influencing%2C%20campaigning%20and%20service%20provision>

⁵ Adults' Media Use and Attitudes report 2023, Ofcom, 29 March 2023, see [Adults' Media Use and Attitudes report 2023 \(ofcom.org.uk\)](https://www.ofcom.gov.uk/consult/condocs/adults/adults_media_use_and_attitudes_report_2023/)

⁶ https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/health--wellbeing/age_uk_briefing_state_of_health_and_care_of_older_people_july2023.pdf

⁷ Prolonged grief disorder prevalence in adults 65 years and over: a systematic review. - Abstract - Europe PMC

⁸ https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/health--wellbeing/age_uk_briefing_state_of_health_and_care_of_older_people_july2023.pdf

⁹ committees.parliament.uk/writtenevidence/43211/html/

¹⁰ DWP State Pension statistics August 2023, retrieved from: [DWP benefits statistics: August 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/dwp-state-pension-statistics-august-2023)

¹¹ [Income-related benefits: estimates of take-up: financial year 2019 to 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/income-related-benefits-estimates-of-take-up-financial-year-2019-to-2020)

¹² <https://www.carersuk.org/policy-and-research/key-facts-and-figures>

¹³ [Make the Call Service | nidirect](https://www.carersuk.org/what-we-do/make-the-call-service)